

EXHIBIT OO



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June 30, 2008

VIA FACSIMILE AND U.S. MAIL

CLIENT/MATTER NUMBER
085437-3056-3080 3081, 3083, 3094 and
3097

Andrea Laiacona
Weinberg, Roger & Rosenfeld
1001 Marina Village Parkway, Ste. 200
Alameda, CA 94501-1091

Re: *SEIU v. Stanford Hospital & Clinics, et al.*
U.S. Dist. Ct. Case Nos.: C-07-cv-5158, 5:08-cv-00213, 5:08-
cv-00215, 5:08-cv-002216, 5:08-cv-01727 and 5:08-cv-01726

Dear Ms. Laiacona:

This will respond to your letter of June 26, 2008 regarding the above-referenced matters and the deposition of Kristy Sermersheim. Ms. Sermersheim, as you know, was the executive secretary of SEIU Local 715 and was involved (and gave testimony) regarding the SEIU International's activities concerning the reorganization of the local union entities – including Local 715. Moreover, Ms. Sermersheim is identified in a number of documents regarding this matter. Thus, Ms. Sermersheim not only has relevant information, her testimony goes to the heart of one of the issues being litigated in the case. Thus, we require her deposition to take place. Please provide us with available dates for this proceeding.

We further write to address Local 521's complete failure to properly respond to the subpoena issued to it and produce documents. We have received no documentation from this entity whatsoever. Please confirm that Local 521 will provide a proper response to the subpoena (as noted in Eileen Ridley's letter of June 9, 2008) and will produce documents this week. Failure of Local 521 to do so will result in a motion to compel being filed to obtain the discovery requested.

Very truly yours,

A handwritten signature in black ink, appearing to read "Scott P. Inciardi".

Scott P. Inciardi

cc: Eileen R. Ridley

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<p>From : Scott P. Inciardi</p> <p>Email Address : sinciardi@foley.com</p> <p>Sender's Direct Dial : 415.984.9863</p> <p>Date : June 30, 2008</p> <p>Client/Matter No : 085437-3056, 3080, 3094, 3083, 3081 & 3097</p> <p>User ID No : 3578</p>

MESSAGE:

Please see the attached.

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